

**Baker & Hostetler LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SUSANNE STONE MARSHALL; ADELE FOX;  
MARSHA PESHKIN; RUSSELL OASIS; A & G  
GOLDMAN PARTNERSHIP; and PAMELA  
GOLDMAN,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 14-01840 (SMB)

**DECLARATION OF FERVE E.  
OZTURK IN SUPPORT OF  
TRUSTEE'S OPPOSITION TO  
MOTION FOR STAY**

FERVE E. OZTURK, under penalty of perjury, declares:

1. I am a member of the Bar of this Court and an associate at the firm of Baker & Hostetler LLP, counsel for Irving H. Picard, Trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the estate of Bernard L. Madoff, individually.

2. I make this declaration to transmit to this Court true and correct copies of documents in connection with the Trustee’s Opposition to the Fox Defendants’ Motion to Stay.

3. True and correct copies of the following documents are attached:

Exhibit A: Notice of Appeal, *Fox v. Jerry [sic] M. Picower Estate*, No. 14-11250 (11th Cir.) (Mar. 24, 2014) (with Exhibit A)

Exhibit B: Appellants’ Motion for Expedited Appeal, *Fox v. Jerry [sic] M. Picower Estate*, No. 14-11250 (11th Cir.) (Apr. 9, 2014)

Exhibit C: Goldman Defendants’ Motion for Leave to Intervene for Limited Purposes and to Disqualify Becker & Poliakoff as Counsel for Appellants, or for Limited Remand, *Fox v. Jerry [sic] M. Picower Estate*, No. 14-11250 (11th Cir.) (Apr. 9, 2014) (exhibits excluded)

Exhibit D: Appellees’ Opposition to Appellants’ Motion for Injunction Pending Appeal, *Fox v. Jerry [sic] M. Picower Estate*, No. 14-11250 (11th Cir.) (Apr. 16, 2014) (exhibits excluded)

Exhibit E: Appellees’ Opposition to Motion for Expedited Appeal and Cross-Motion to Dismiss Appeal, *Fox v. Jerry [sic] M. Picower Estate*, No. 14-11250 (11th Cir.) (Apr. 16, 2014) (exhibits excluded)

Exhibit F: Clerk’s Communication Setting April 22, 2014 as Appellants’ Deadline to Response to Cross-Motion to Dismiss, *Fox v. Jerry [sic] M. Picower Estate*, No. 14-11250 (11th Cir.) (Apr. 17, 2014)

Exhibit G: Appellees' Reply Memorandum in Support of Their Cross-Motion to Dismiss, *Fox v. Jerry [sic] M. Picower Estate*, No. 14-11250 (11th Cir.) (Apr. 24, 2014)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 24, 2014  
New York, New York



Ferve E. Ozturk